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May 18, 1994

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VIA HAND DELIVERY

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MAY 18 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

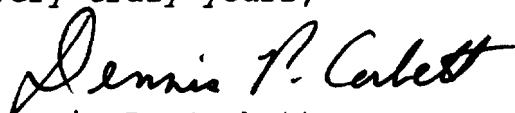
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Mr. Caton:

On behalf of Skip Marrow, I am transmitting herewith an original and four copies of his Petition for Rule Making seeking to amend the FM Table of Allotments to add Channel 271A at Elma, Washington.

Should there be any questions concerning this matter, please contact the undersigned.

Very truly yours,


Dennis P. Corbett

DPC:kbs
Enclosures

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BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

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MAY 18 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b)) RM _____
Table of Allotments,)
FM Broadcast Stations.)
(Elma, Washington))

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

PETITION FOR RULE MAKING

Skip Marrow, by his attorneys and pursuant to Section 1.401 of the Commission's rules, hereby seeks the institution of a rule making proceeding looking toward the amendment of Section 73.202(b) of the Commission's Rules, the FM Table of Allotments, to add FM Channel 271A to Elma, Washington as its first local service. Elma is located in Grays Harbor County and has a 1990 U.S. Census population of 3011 persons.

As shown in the attached channel study, Channel 271A may be allotted to Elma, Washington consistent with all Commission spacing requirements.^{1/}


^{1/} It is requested that Channel 271A be allotted to Elma, Washington at the reference coordinates of 47° 00' 13" North Latitude, 123° 24' 27" West Longitude.

Skip Marrow, or an entity with Mr. Marrow as a principal, has a present intention to apply for the channel if it is allotted, and if authorized, to build a station promptly.

WHEREFORE, for the reasons above, a rule making proceeding should be instituted looking toward the addition of Channel 271A at Elma, Washington to the FM Table of Allotments.

Respectfully submitted,

SKIP MARROW

By: 
Dennis P. Corbett
Nancy A. Ory

Leventhal, Senter & Lerman
2000 K Street, N.W.
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May 18, 1994

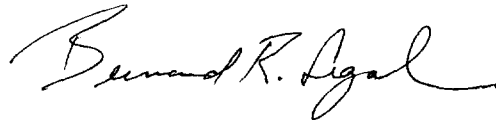
His Attorneys

**ENGINEERING STATEMENT
IN SUPPORT OF PETITION FOR RULE MAKING
TO AMEND SECTION 73.202(b), TABLE OF ALLOTMENTS
SKIP MARROW
ELMA, WASHINGTON**

The instant engineering statement has been prepared on behalf of Skip Marrow (Marrow) in support of a petition for rule making to amend Section 73.202(b), Table of Allotments. By means of the instant petition, Marrow requests the addition of Channel 271A to Elma, Washington. Elma is located in Grays Harbor County and has a 1990 U.S. Census population of 3011 persons. No AM or FM stations are licensed to Elma.

The accompanying tabulation demonstrates compliance with all the minimum spacing requirements of Section 73.207 of the Rules for the proposed Class A allotment. Insofar as the separation with respect to Canadian allotments is concerned, the class for the Elma allotment has been assumed to be a B1. The Table demonstrates compliance with all minimum spacing requirements using the reference coordinates for Elma given in the National Atlas.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 29, 1994.



Bernard R. Segal, P.E.

**ENGINEERING STATEMENT
IN SUPPORT OF PETITION FOR RULE MAKING
TO AMEND SECTION 73.202(b), TABLE OF ALLOTMENTS
SKIP MARROW
ELMA, WASHINGTON**

Ch. 271A Allocation Study
Elma, Washington

Reference Coordinates: 47° 00' 13" NL
123° 24' 27" WL

<u>Channel</u>	<u>Station or Allotment</u>	<u>Geographic Coordinates</u> (N.Lat./W.Long.)	<u>Class Relation- ship</u>	<u>Spacing</u>	
				<u>Actual</u> (km)	<u>Required Minimum</u> (km)
217	None sufficiently close for concern				
218	None sufficiently close for concern				
268	KPLZ, Seattle, WA 100 kW (Max, H&V), 366 m	47° 32' 42" 122° 06' 29"	A-C	115.3	95
269	None sufficiently close for concern				
270	KINK-FM, Portland, OR 100 kW (Max, H&V), 510 m	45° 31' 21" 122° 44' 46"	A-C	172.4	165
	Allotment, Victoria, B.C.	48° 25' 00" 123° 22' 00"	B1-B	157.1	149
271	KPQ-FM, Wenatchee, WA 35 kW (H&V), 809 m	47° 16' 28" 120° 25' 30"	A-C	228.3	226
272	None sufficiently close for concern				
273	KZOK-FM, Seattle, WA 100 kW (H&V), 357 m	47° 32' 35" 122° 06' 25"	A-C	115.3	95